IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MATTHEW RALSTON,

Plaintiff, : CIVIL ACTION

:

MITCHELL GARABEDIAN, ESQUIRE, et al,

V.

NO. 2:19-cv-01539

Defendants.

MOTION IN LIMINE BY GARABEDIAN DEFENDANTS TO PRECLUDE CERTAIN EXHIBITS IDENTIFIED BY PLAINTIFF

Defendants, Mitchell Garabedian, Esquire and Mitchell Garabedian, Esquire d/b/a Law Offices of Mitchell Garabedian ("Garabedian"), by and through their undersigned counsel, Swartz Campbell LLC, move *in limine* to preclude certain exhibits identified by plaintiff.

A summary chart is attached as Exhibit "K." Garabedian moves to preclude plaintiff from offering the following joint exhibits: ¹ J-1, J-2, J-4 through J-11, J-13 through J-18, J-20, J-22, J-23, J-25 through J-27, J-31 through J-36, J-39, J-40, J-46 through J-56, J-58 through J-62, J-65, J-67, J-80, J-143, and J-152. The basis to preclude the exhibits is more fully set forth in the chart and memorandum of law.

WHEREFORE, the Court should grant Garabedian defendants' motion and preclude exhibits J-1, J-2, J-4 through J-11, J-13 through J-18, J-20, J-22, J-23, J-25 through J-27, J-31 through J-36, J-39, J-40, J-46 through J-56, J-58 through J-62, J-65, J-67, J-80, J-143, and J-152.

Garabedian has otherwise asserted objections to certain joint trial exhibits but has not moved for preclusion and will reserve for the objections for time of trial to see if and how presented by plaintiff.

Respectfully submitted,

/s/ Candidus K. Dougherty
Jeffrey B. McCarron
Candidus K. Dougherty
SWARTZ CAMPBELL LLC
One Liberty Place, 38th Floor
1650 Market Street
Philadelphia, PA 19103
Phone (215) 299-4296
Fax (215) 299-4301
cdougherty@swartzcampbell.com

Dated: January 4, 2022